

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2022 NOV 14 PM 4:23

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAXIMUS OKWUDILI ADIELE,

Defendant.

CASE NO. 2:22-cr-218

JUDGE Graham

INFORMATION

18 U.S.C. § 1956(a)(1)(B)(i)

26 U.S.C. § 7206(1)

FORFEITURE ALLEGATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(Concealment Money Laundering)

1. On or about September 17, 2019, in the Southern District of Ohio, Defendant **MAXIMUS OKWUDILI ADIELE** did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce – namely, sending and causing to be sent a wire transfer in the amount of \$27,660 from J.P. Morgan Chase Bank account number ending in x7562 in the name of Maximus Adiele, dba Max Investment Group, with wire memo “business expenses” to an account held in the name of Offor Ka Nsi Global Resources at Diamond Bank located in Lagos, Nigeria, which involved the proceeds of a specified unlawful activity – namely, wire fraud – knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that, while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. § 1956(a)(1)(B)(i).

COUNT 2
(Willfully Subscribing to a False Income Tax Return)

2. The factual allegations contained in Paragraph 1 of this Information are realleged and incorporated herein.

3. On or about March 28, 2018, in the Southern District of Ohio, Defendant **MAXIMUS OKWUDILI ADIELE**, a resident of Columbus, Ohio, did willfully make and subscribe a form 1040 U.S. Individual Income Tax Return for the year 2017, which he verified by a written declaration that it was made under the penalties of perjury and which was filed with the Internal Revenue Service, which Defendant **MAXIMUS OKWUDILI ADIELE** did not believe to be true and correct as to every material matter, in that Defendant **MAXIMUS OKWUDILI ADIELE** well knew and believed that he had submitted false information regarding his gross receipts on his Schedule C for Max Investment Group, stating that gross receipts were \$11,400, when in fact, his gross receipts were approximately \$56,052.39.

In violation of 26 U.S.C. § 7206(1).

FORFEITURE ALLEGATION

4. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of 18 U.S.C. § 982(a)(1).

5. Upon conviction of the offense alleged in Count 1 of this Information in violation of 18 U.S.C. § 1956(a)(1)(B)(i), Defendant **MAXIMUS OKWUDILI ADIELE** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property, including, but not limited to, a sum of money equal to \$27,660.00 in United States currency in the form of a forfeiture money judgment.

6. **Substitute Assets:** If any of the forfeitable property, as a result of any act or omission of Defendant **MAXIMUS OKWUDILI ADIELE**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of Defendant **MAXIMUS OKWUDILI ADIELE**, up to the value of the forfeitable property.

Forfeiture in accordance with 18 U.S.C. § 982(a)(1) and Rule 32.2 of the Federal Rules of Criminal Procedure.

KENNETH L. PARKER
UNITED STATES ATTORNEY



BRENDA S. SHOEMAKER (0041411)
Assistant United States Attorney



DAVID J. TWOMBLY (0092558)
Assistant United States Attorney